

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

**DEFENDANT'S MOTION FOR A LIMITED EXEMPTION FROM THE STANDING  
ORDER REGARDING PERSONAL ELECTRONIC DEVICES**

Defendant Warner Bros. Discovery, Inc. (“Warner Bros.”) hereby moves for an order to exempt Joshua Geller from the District of Delaware’s May 17, 2024 Standing Order on Procedures Regarding the Possession and Use of Cameras and Personal Electronic Devices by Visitors to the J. Caleb Boggs Federal Building and United States Courthouse (the “May 17, 2024 Standing Order”). In support of this Motion, Warner Bros. states as follows:

1. The District of Delaware's May 17, 2024 Standing Order provides procedures to regulate the possession and use of personal electronic devices by visitors to the J. Caleb Boggs Federal Building and United States Courthouse, which require, *inter alia*, for visitors to place personal electronic devices in a locked pouch. Paragraph 4 of the May 17, 2024 Standing Order provides for certain exemptions to the Standing Order.

2. A discovery conference is scheduled in this case for September 30, 2024, in Courtroom 6A.

3. Warner Bros. requests that Joshua Geller be allowed to bring his electronic devices into the courtroom on September 30 for use during the hearing. Mr. Geller is lead counsel for

Warner Bros. and has been admitted *pro hac vice* in this matter, but does not have access to a state-issued bar card.

WHEREFORE, Warner Bros. respectfully requests that the Court issue an order to exempt Mr. Geller from the May 17, 2024 Standing Order.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

*/s/ Michael J. Flynn*

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*Attorneys for Defendant*

September 26, 2024

IT IS SO ORDERED this 26 day of September, 2024.

*/s/ Richard G. Andrews*

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The Hon. Richard G. Andrews  
U.S. District Judge